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Superior Court of California
County of Los Angeles

JUN 19 2017
Sherri R. Carter, Executive Officer/Clerk
By: *M. Soto*, Deputy
Moses Soto

NO FEE - GOV'T CODE § 6103

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

12 Plaintiff,

13 vs.

14 L&B REAL ESTATE, a California Limited
15 Partnership; WILLIAM LITTLE, an individual; and
16 DOES 1 through 50, inclusive,

17 Defendants.

18 Case No.: BC 665506

19 COMPLAINT FOR ABATEMENT
20 AND INJUNCTION

21 [HEALTH & SAFETY CODE
22 SECTION 11570, *ET SEQ.*; CIVIL
23 CODE SECTION 3479, *ET SEQ.*;
24 BUS. & PROF. CODE SECTION
25 17200, *ET SEQ.*]
26

27 [Unlimited Action]

1 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

2 I. INTRODUCTION

3 1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the
4 State of California ("People"), for the purpose of abating, preventing, and enjoining a narcotics-
5 and gang-related public nuisance that exists at an approximately sixteen-unit apartment
6 complex that consists of approximately eleven bungalows and a two-story building, located in
7 South Los Angeles with addresses commonly known as 526 - 536 ½ W. 82nd Street, Los
8 Angeles, CA 90044 (the "Property")¹. The Action is brought pursuant to the Narcotics
9 Abatement Law ("NAL"), California Health and Safety Code section 11570, *et seq.*; the Public
10 Nuisance Law ("PNL"), California Civil Code sections 3479-3480; and the Unfair Competition
11 Law ("UCL"), California Business and Professions Code section 17200, *et seq.*

12 2. The Property is located on 82nd Street between Figueroa and Hoover
13 (hereinafter, the "Block"), where the notorious 18th Street gang (the "Gang" or "18th Street")
14 has used its *de facto* control over multiple residential buildings, including the Property, to
15 radiate crime, disorder, and intimidation up and down the entire Block.² 18th Street is a
16 transnational gang originally founded in the Rampart area of the City of Los Angeles, which
17 has subsequently spread through the city, region, country and numerous places abroad. One
18 of the Gang's many cliques or sets, often called "Los Gangsters" or "Los Gees," claims as its
19 turf the area in and around the intersection of 82nd and Figueroa Streets, encompassing the
20 Property.

21 3. The Property stands out to both law enforcement and to the community as one of
22 the most troublesome 18th Street hangouts on the Block, and as an epicenter from which 18th
23 Street exerts its control and claim over the surrounding community. Gang members and
24 associates can be found sitting or otherwise congregating on the Property, usually directly

26 1 The Property's addresses include: 526, 526 ½, 528, 528 ½, 530, 530 ½, 532, 532 ¼, 532 ½, 532 ¾, 534, 534
27 ½, 534 ½, 536, 536 ¼, 536 ½ W. 82nd Street.

28 2 Plaintiff has pending nuisance abatement cases relating to three other properties on this Block: 538 W. 82nd
Street (*People v. Espinosa, et al.*, LASC Case No. BC616034), 601 W. 82nd Street (*People v. Espinosa, et al.*,
LASC Case No. BC616032), and 723 W. 82nd Street (*People v. Summit Assets Group, LLC*, LASC Case No.
BC616033), which were filed on April 6, 2016.

1 adjacent to the sidewalk, at all hours of the day. They either conduct their narcotics
2 transactions on the Property itself or direct the pedestrian traffic to other surrounding
3 residences, knowing that the Property is on law enforcement's radar for being an 18th Street
4 stronghold. The Gang has also been known to use the Property itself, such as the electrical
5 panel or the mail boxes, to stash their narcotics. Since 2011, there have been 17 arrests at, or
6 otherwise connected to, the Property, 11 of which were narcotics-related. These represent
7 only that fraction of the criminal and nuisance activity occurring at the Property that is reported
8 to or otherwise detected by the Los Angeles Police Department ("LAPD"). Further, given the
9 Gang's constant presence on the Property, it is an easy target for rival gang members. In fact,
10 the Property has already been the site of two documented shootings since 2013, in addition to
11 a third attempt wherein a rival gang member threatened a shooting at the Property against an
12 18th Street gang member but was thwarted by LAPD before it occurred.

13 4. This Property, which has been left vulnerable through lax management, fosters
14 and amplifies 18th Street's hold on the Block by serving as a piece of the Gang's turf that is
15 especially hospitable and conducive to the Gang's commercial operations and social
16 imperatives. Put simply, criminal street gangs in Los Angeles are inherently and fundamentally
17 territorial. They need certain places within their turf to be open to them so that they can do
18 what makes them a street gang: a) occupy turf; b) socially cohere with each other; c) project
19 power (sometimes through the barrel of a gun) within that turf as against both rival gangs and
20 law-abiding people who might present a risk of cooperating with law enforcement against the
21 gang; and d) sell drugs to make money for those up and down the gang's hierarchy. Not every
22 building within a gang's turf is available for exploitation by the gang in this fashion as some are
23 managed better, more physically fortified, lack gang "friendlies" that attract gang members in
24 the first place, and so on. The properties that do fall under the grip of a gang, however – such
25 as the Property complained of herein – often ripen into serious gang-related crime centers.

26 5. The chaos and lawlessness at the Property occurs perilously close to two
27 schools and four houses of worship, all of which are located within a mere 1,500 feet of the
28 Property.

1 6. Defendant WILLIAM LITTLE ("Little") and Defendant L&B REAL ESTATE, A
2 CALIFORNIA LIMITED PARTNERSHIP ("L&B Real Estate") (collectively, the "Defendants"), as
3 the person and entity ultimately responsible for the Property, have failed to implement
4 appropriate physical and managerial best practices to combat the foregoing nuisance dynamic.
5 The intent of this nuisance abatement prosecution is to compel such action by Defendants as
6 is necessary to bring the entirely unacceptable state of affairs at the Property to a swift and
7 permanent halt, including via an order that Little reside at the Property until the nuisance is
8 abated.

9 II. THE PARTIES AND THE PROPERTY

10 A. The Plaintiff

11 7. Plaintiff, the People, is the sovereign power of the State of California designated
12 in California Health and Safety Code section 11571 and California Code of Civil Procedure
13 section 731 to be the complaining party in actions brought to abate, enjoin, and penalize
14 narcotics nuisances and public nuisances, respectively. Furthermore, the City of Los Angeles
15 has a population in excess of 750,000, and as such, California Business and Professions Code
16 section 17204 authorizes Plaintiff, the People, to prosecute actions for relief under California
17 Business and Professions Code section 17200, *et seq.* for unlawful competition.

18 B. The Defendants

19 8. Defendant WILLIAM LITTLE, an individual, owned the Property with his
20 wife/partner, Minnie Brown, since at least April 14, 1993, before transferring title to Defendant
21 L&B REAL ESTATE, A CALIFORNIA LIMITED PARTNERSHIP, for which Little is a general
22 partner, on or about October 29, 1993. L&B Real Estate is the current record owner of the
23 Property.

24 9. The true names and capacities of defendants sued herein as Does 1 through 50,
25 inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious
26 names. When the true names and capacities of said defendants have been ascertained,
27 Plaintiff will seek leave of Court to amend this complaint and to insert in lieu of such fictitious
28 names the true names and capacities of said fictitiously named defendants.

1 C. The Property

2 10. The Property's legal description is "Lot 259 of Sunnyside Park Addition, in the
3 City of Los Angeles, in the County of Los Angeles, State of California, as per map recorded in
4 Book 6 Page 198 of Maps, in the office of the County Recorder of said County," with
5 Assessor's Parcel Number 6032-021-019.

6 III. THE NARCOTICS ABATEMENT LAW

7 11. The abatement of a nuisance is a long established and well-recognized exercise
8 of the state's police power. (*People v. Barbiere* (1917) 33 Cal.App. 770, 775; *People ex rel.
9 Hicks v. Sarong Gals* (1974) 42 Cal.App.3d 556, 563.) Since its enactment in 1972, the
10 principal purpose of the NAL (Health & Saf. Code, § 11570, *et seq.*) is the abatement of
11 buildings and places "used for the purpose of unlawfully selling, serving, storing, keeping,
12 manufacturing, or giving away any controlled substance, precursor, or analog specified in this
13 division . . ." (Health & Saf. Code, § 11570).

14 12. The NAL provides that every building or place used for the purpose of unlawfully
15 selling, serving, storing, keeping, manufacturing, or giving away any controlled substance,
16 precursor, or analog, *inter alia*, "is a nuisance which **shall** be enjoined, abated, and prevented .
17 . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570 (emphasis added);
18 *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v. Superior Court*
19 (1993) 20 Cal.App.4th 866, 870-871.)

20 13. Health and Safety Code section 11571 authorizes a city attorney to bring an
21 action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part:
22 "Whenever there is reason to believe that a nuisance as described in Section 11570 is kept,
23 maintained, or exists in any county, the district attorney of the county, or the city attorney of
24 any incorporated city or of any city and county, in the name of the people, may . . . maintain an
25 action to abate and prevent the nuisance and perpetually to enjoin the person conducting or
26 maintaining it, and the owner, lessee, or agent of the building or place in or upon which the
27 nuisance exists from directly or indirectly maintaining or permitting the nuisance."

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1 14. Health and Safety Code section 11573(a) provides that: "If the existence of the
2 nuisance is shown in the action to the satisfaction of the court or judge, either by verified
3 complaint or affidavit, the court or judge ***shall*** allow a temporary restraining order or injunction
4 to abate and prevent the continuance or recurrence of the nuisance." (Emphasis added.) In
5 addition, Health and Safety Code section 11581 provides, as an additional remedy, for the
6 removal and sale of all fixtures and movable property on the premises used in aiding or
7 abetting the nuisance and for the closure of the building for up to one year.

8 IV. **THE PUBLIC NUISANCE LAW**

9 15. Civil Code section 3479 defines a public nuisance as "[a]nything which is
10 injurious to health, including, but not limited to, the illegal sale of controlled substances, or is
11 indecent or offensive to the senses, or an obstruction to the free use of property, so as to
12 interfere with the comfortable enjoyment of life or property, or unlawfully obstructs the free
13 passage or use, in the customary manner, of any . . . public park, square, street, or highway . .
14 . ." (See *City of Bakersfield v. Miller* (1966) 64 Cal.2d 93, 99 ("The Legislature has defined in
15 general terms the word 'nuisance' in Civil Code section 3479. . .").)

16 16. Civil Code section 3480 defines a public nuisance as "one which affects at the
17 same time an entire community or neighborhood, or any considerable number of persons,
18 although the extent of the annoyance or damage inflicted upon individuals may be unequal."

19 17. In particular, gang activity, such as drug dealing, loitering, consumption of alcohol
20 and illegal drugs, and boisterous conduct which creates a "hooligan-like atmosphere"
21 constitutes a public nuisance. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)

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1 18. Civil Code section 3491 provides for the methods by which public nuisances
2 such as those alleged herein may be abated. Civil Code section 3491 states that the
3 "remedies against a public nuisance are indictment or information, a civil action or abatement."
4 Abatement is "accomplished by a court of equity by means of an injunction proper and suitable
5 to the facts of each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249; see also *People v.*
6 *Selby Smelting and Lead Co.* (1912) 163 Cal. 84, 90 ("[I]n California, the rule is well established
7 that in proper cases injunctive relief which accomplishes the purposes of abatement without its
8 harsh features is permissible.").)

9 19. Code of Civil Procedure section 731 authorizes a city attorney to bring an action
10 to enjoin or abate a public nuisance. It provides in relevant part "[a] civil action may be brought
11 in the name of the people of the State of California to abate a public nuisance . . . by the city
12 attorney of any town or city in which such nuisance exists."

13 20. Where "a building or other property is so used as to make it a nuisance under the
14 statute, the nuisance may be abated . . . , notwithstanding that the owner had no knowledge
15 that it was used for the unlawful purpose constituting a nuisance." (*People ex rel. Bradford v.*
16 *Barbiere* (1917) 33 Cal.App. 770, 779; see also *Sturges v. Charles L. Harney, Inc.* (1958) 165
17 Cal.App.2d 306, 318 ("a nuisance and liability therefore may exist without negligence"); *People*
18 *v. McCadden* (1920) 48 Cal.App. 790, 792 ("A judgment supported on findings that such
19 nuisance was conducted and maintained on the premises in question, regardless of the
20 knowledge of the owner thereof, is sufficient. Such knowledge on the part of the owner . . . is
21 unnecessary."); *People v. Peterson* (1920) 45 Cal.App. 457, 460 ("[I]t was not necessary . . .
22 for the trial court to find either, that the [defendants] threatened, and unless restrained, would
23 continue to maintain, aid, and abet, the nuisance, or that they knew the building was used in
24 violation of the act. . . . The existence of the nuisance was the ultimate fact in this case, and
25 having been found, supports the judgment.").) This is because "the object of the act is not to
26 punish; its purpose is to effect a reformation of the property itself." (*People v. Bayside Land*
27 *Co.* (1920) 48 Cal.App. 257, 261.)

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2 V. UNFAIR COMPETITION LAW

3 21. The practices forbidden by California's Unfair Competition Law at Business and
4 Professions Code section 17200 *et seq.* include any practices forbidden by law, be they
5 criminal, federal, state, municipal, statutory, regulatory or court-made. As the California
6 Supreme Court has explained, the UCL "borrows violations of other laws and treats them as
7 unlawful practices independently actionable under section 17200 *et seq.*" (*South Bay*
8 *Chevrolet v. General Motors Acceptance Corp.* (1999) 72 Cal.App.4th 861, 880 (internal
citations and quotation marks omitted).)

9 22. As proscribed by the UCL, "[a]n 'unlawful business activity' includes anything that
10 can properly be called a business practice and that at the same time is forbidden by law."
11 (*People v. McKale* (1979) 25 Cal.3d 626, 632.) Moreover, the UCL casts a broad net. "Any
12 person performing or proposing to perform an act of unfair competition may be enjoined"
13 (Bus. & Prof. Code, § 17203.) The term "person" includes "natural persons, corporations,
14 firms, partnerships, joint stock companies, associations and other organizations of persons."
15 (Bus. & Prof. Code, § 17201.) The courts have expanded section 17200's net beyond direct
16 liability to include common law doctrines of secondary liability where the liability of each
17 defendant is predicated on his or her personal participation in the unlawful practices. (*People*
18 *v. Toomey* (1985) 157 Cal.App.3d 1, 14; *Emery v. Visa Int'l Service Ass'n* (2002) 95
19 Cal.App.4th 952, 960.)

20 23. Civil actions under the UCL may be brought in the name of the People of the
21 State of California by any city attorney of a city having a population in excess of 750,000 (Bus.
22 & Prof. Code, § 17204), such as the City of Los Angeles. A public entity can sue pursuant to
23 section 17200 based on violations of its own municipal code, state law, or other local
24 ordinance. (*People v. Thomas Shelton Powers, M.D., Inc.* (1992) 2 Cal.App.4th 330, 338-
25 339.)

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1 24. Defendants engaging in violations of the UCL may be enjoined in any court of
2 competent jurisdiction. (Bus. & Profs. Code, § 17203.) A court may make such orders or
3 judgments, including appointment of a receiver, as may be necessary to prevent the use or
4 employment by any person of any practice constituting unfair competition. (*Id.*)

5 25. Although no case has specifically been called upon to define the term "business"
6 in section 17200, courts have frequently given a broad reading to the provisions of the UCL so
7 as to effect its broad remedial purposes. (See, e.g., *Barquis v. Merchants Collection Ass'n*
8 (1972) 7 Cal.3d 94, 111-113.) An enterprise engaged entirely in criminal conduct such as the
9 manufacture of illegal drugs or obscene matter is a business for purposes of section 17200.
10 (*People v. EWAP, Inc.* (1980) 106 Cal.App.3d 315, 320-321.) Moreover, recent amendments
11 to section 17200 make clear that even a one-time act of misconduct can constitute a violation
12 of the UCL. (*Klein v. Earth Elements, Inc.* (1997) 59 Cal.App.4th 965, 969.)

13 26. Further, the ownership and operation of a rental apartment complex is,
14 axiomatically, a business. (See *People ex rel. City of Santa Monica v. Gabriel* (2010), 186
15 Cal.App.4th 882, 888 ("The renting of residential housing is a business."); see also *Barquis v.*
16 *Merchants Collection Ass'n*, (1972) 7 Cal.3d 94, 111-113 (giving a broad meaning of the UCL
17 so as to effect its broad remedial purposes).) Thus, when a property owner conducts,
18 maintains or permits a nuisance that is unlawful under the NAL and/or PNL to exist on the
19 premises of such a business, it is a violation of the UCL. (See *San Francisco v. Sainez* (2000)
20 77 Cal.App.4th 1302, 1323.)

21 **VI. FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

22 [**Health and Safety Code Section 11570, et seq. --**

23 **Against All Defendants and DOES 1 through 50]**

24 27. Plaintiff hereby incorporates by reference paragraphs 1 through 26 of this
25 Complaint and makes them part of the First Cause of Action, as if fully set forth herein.

26 28. The Property has been from an exact date unknown but since at least 1997,
27 which is as far back as electronic databases readily accessible to Plaintiff cover, and is
28 currently being used for the purposes of unlawfully selling, serving, storing, keeping,

1 manufacturing or giving away controlled substances in violation of Health and Safety Code
2 section 11570, et seq. The Gang uses the Property to sell its narcotics, direct pedestrian
3 traffic to its narcotics sellers located elsewhere on the Block, and to store the narcotics in
4 various places such as the electrical panel and mailboxes.

5 29. Defendants, and DOES 1 through 50, are responsible for conducting,
6 maintaining, and/or directly or indirectly permitting the nuisance as alleged herein. Plaintiff has
7 no plain, speedy and adequate remedy at law, and unless Defendants and DOES 1 through 50
8 are restrained and enjoined by order of this Court, they will continue to use, occupy and
9 maintain, and/or to aid, abet or permit, directly or indirectly, the use, occupation and
10 maintenance of the Property, together with the fixtures and appurtenances located therein, for
11 the nuisance complained of herein, to the great and irreparable damage of the public and in
12 violation of California law.

13 **VII. SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

14 **[Civil Code Section 3479, et seq. --**

15 **Against All Defendants and DOES 1 through 50]**

16 30. Plaintiff incorporates by reference Paragraphs 1 through 29 of this Complaint and
17 makes them part of this Second Cause of Action as though fully set forth herein.

18 31. Since at least 1997, through the present time, the Property has been owned,
19 operated, occupied, used, and/or directly or indirectly permitted to be occupied and used, in
20 such a manner as to constitute a public nuisance in violation of Civil Code sections 3479 and
21 3480. The public nuisance, as described herein, is injurious to health, indecent or offensive to
22 the senses, and/or an obstruction to the free use of property, so as to substantially and
23 unreasonably interfere with the comfortable enjoyment of life or property by those persons
24 living in the surrounding community. The public nuisance at and around the Property consists
25 of, but is not limited to: shootings; illegal narcotics sales, storage, and/or distribution;
26 possession of illegal firearms; violence against community members; and the threatening and
27 disorderly presence of gang members and associates.

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1 32. Defendants, and DOES 1 through 50, in owning, conducting, maintaining, and/or
2 permitting the use of the Property, directly or indirectly, as a public nuisance, have engaged in
3 wrongful conduct and caused a serious threat to the general health, safety and welfare of the
4 persons in the area surrounding the Property.

5 33. Unless Defendants, and DOES 1 through 50, are restrained and enjoined by
6 order of this Court, they will continue to use, occupy and maintain, and to aid, abet or permit,
7 directly or indirectly, the use, occupation, and maintenance of the Property, together with the
8 fixtures and appurtenances located therein, for the purpose complained of herein, to the great
9 and irreparable damage of Plaintiff and in violation of California law.

10 **VIII. THIRD CAUSE OF ACTION FOR UNFAIR COMPETITION**

11 **[Business and Professions Code Section 17200, et seq. --**

12 **Against All Defendants and DOES 1 through 50]**

13 34. Plaintiff hereby incorporates by reference paragraphs 1 through 33 of this
14 Complaint and makes them part of this Third Cause of Action, as if fully set forth herein.

15 35. Ownership and rental of residential housing, such as the Property, is a business.
16 When the owner of such a business violates the NAL and/or PNL such that a nuisance exists
17 and flourishes at the business' premises, as set forth herein, it is also a violation of the UCL.

18 36. Defendants and DOES 1-50 have violated the UCL by engaging in the following
19 unlawful or unfair business acts and practices: conducting, maintaining and/or permitting,
20 directly or indirectly, narcotics activity at the Property amounting to violations of the NAL as
21 alleged herein; and/or conducting, maintaining and/or permitting, directly or indirectly, narcotics
22 and other gang-related criminal and/or nuisance activity at the Property, as alleged herein, in
23 violation of the PNL.

24 37. Plaintiff has no adequate remedy at law, and unless Defendants and DOES 1-50
25 are restrained by this Court they will continue to commit unlawful business practices or acts,
26 thereby causing irreparable injury and harm to the public's welfare.

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PRAYER

**WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND
DECREE AS FOLLOWS:**

AS TO THE FIRST CAUSE OF ACTION

1. That Defendants, DOES 1 through 50, and the Property, be declared in violation of California Health and Safety Code section 11570, *et seq.*
 2. That the Court order Little, as a general partner of L&B Real Estate, to reside in the Property until the nuisance is abated, in accordance with California Health and Safety Code section 11573.5.
 3. That the Property, together with the fixtures and moveable property therein and thereon, be found to constitute a public nuisance and be permanently abated as such in accordance with Section 11581 of the California Health and Safety Code.
 4. That the Court grant a preliminary injunction, permanent injunction and order of abatement in accordance with Section 11570, *et seq.* of the California Health and Safety Code, enjoining and restraining each Defendant and their agents, officers, employees and anyone acting on their behalf, from unlawfully selling, serving, storing, keeping, manufacturing, or giving away controlled substances on the Property.
 5. That the Court order physical and managerial improvements to the Property in accordance with California Health and Safety Code section 11573.5, and such orders as are otherwise appropriate, to remedy the nuisance on the Property and enhance the abatement process, including but not limited to, the following: an internet-connected video monitoring system accessible by LAPD; improved lighting; sufficiently secure gating and fencing; improved screening of tenants; armed, licensed security guards; the prohibition of known gang members from accessing the Property; and the retention of a property management company as well as new on-site management.
 6. That as part of the Judgment, an Order of Abatement be issued, and that the Property be closed for a period of one year, not to be used for any purpose, and be under the control and custody of this Court for said period of time, or, in the alternative, if the Court

1 deems such closure to be unduly harmful to the community, that Defendants, and DOES 1
2 through 50, pay an amount equal to the fair market rental value of the Property for one year to
3 the City or County in whose jurisdiction the nuisance is located in accordance with Health and
4 Safety Code section 11581 subdivision (c)(1).

5 7. That each of the Defendants be assessed a civil penalty in an amount not to
6 exceed twenty-five thousand dollars (\$25,000.00).

7 8. That all fixtures and moveable property used in conducting, maintaining, aiding or
8 abetting the nuisance at the Property be removed by the LAPD and sold in the manner
9 provided for the sale of chattels under execution. Said fixtures and property shall be
10 inventoried and a list prepared and filed with this Court.

11 9. That there shall be excepted from said sale, such property to which title is
12 established in some third party not a defendant, nor agent, officer, employee or servant of any
13 defendant in this proceeding.

14 10. That the proceeds from said sale be deposited with this Court for payment of the
15 fees and costs of sale. Such costs may occur in closing said Property and keeping it closed,
16 removal of said property, and Plaintiff's costs in the Action, including attorneys' fees, and such
17 other costs as the Court shall deem proper.

18 11. That if the proceeds of the sale do not fully discharge all such costs, fees and
19 allowances, the Property shall also be sold under execution issued upon the order of the Court
20 or judge and the proceeds of such sale shall be applied in a like manner. That any excess
21 monies remaining after payment of approved costs shall be delivered to the owner of said
22 Property. Ownership shall be established to the satisfaction of this Court.

23 12. That Defendants, DOES 1 through 50, and any agents, trustees, officers,
24 employees and anyone acting on their behalf, and their heirs and assignees, be perpetually
25 enjoined from transferring, conveying, or encumbering any portion of the Property, for
26 consideration or otherwise, without first obtaining the Court's prior approval.

27 13. That Defendants, and DOES 1 through 50, be ordered to immediately notify any
28 transferees, purchasers, commercial lessees, or other successors in interest to the subject

Property of the existence and application of any temporary restraining order, preliminary injunction, or permanent injunction to all prospective transferees, purchasers, commercial lessees, or other successors in interest, *before* entering into any agreement to sell, lease or transfer the Property, for consideration or otherwise, all or any portion of the Property that is the subject of this Action.

14. That Defendants, and DOES 1 through 50, be ordered to immediately give a complete, legible copy of any temporary restraining order and preliminary and permanent injunctions to all prospective transferees, purchasers, lessees, or other successors in interest to the Property.

15. That Defendants, and DOES 1 through 50, be ordered to immediately request and procure signatures from all prospective transferees, purchasers, lessees, or other successors in interest to the subject Property, which acknowledges his/her respective receipt of a complete, legible copy of any temporary restraining order, preliminary and permanent injunction, and deliver a copy of such acknowledgment to the Los Angeles City Attorney's Office, c/o Deputy City Attorney Nancy C. Hagan or her designee.

16. That Plaintiff recover the costs of this Action, including law enforcement investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed \$1,000,000.00, from Defendants and DOES 1 through 50.

AS TO THE SECOND CAUSE OF ACTION

1. That the Property, together with the fixtures and moveable property therein and thereon, be declared a public nuisance and be permanently abated as such in accordance with California Civil Code section 3491.

2. That each Defendant and their agents, officers, employees and anyone acting on their behalf, and their heirs and assignees, be preliminarily and perpetually enjoined from operating, conducting, using, occupying, or in any way permitting the use of the Property as a public nuisance. Such orders should include, but not be limited to physical and managerial improvements to the Property, and such other orders as are appropriate to remedy the nuisance on the Property and enhance the abatement process.

3. Such costs as may occur in abating said nuisance at the Property and such other costs as the Court shall deem just and proper.

4. That Plaintiff be granted such other and further relief as the Court deems just and proper, including closure and/or demolition of the Property.

AS TO THE THIRD CAUSE OF ACTION

1. That each Defendant be declared in violation of Business and Professions Code section 17200.

2. That each Defendant, as well as their agents, heirs, successors, and anyone acting on its behalf, be permanently enjoined from maintaining, operating, or permitting any unlawful or unfair business acts or practices in violation of Business and Professions Code section 17200.

3. That the Court grant a preliminary and/or permanent injunction prohibiting each Defendant, as well as their agents, heirs, successors, and anyone acting on their behalves, from engaging in the unlawful or unfair acts and/or practices described herein at the Property and in the City of Los Angeles. Such orders should include physical and managerial improvements to the Property.

4. That, pursuant to Business and Professions Code section 17206, each Defendant be assessed a civil penalty of \$2,500 for each and every act of unfair competition.

5. That, pursuant to the Court's equitable power and Business and Professions Code section 17203, the Court make such orders or judgments, including appointment of a receiver, to eliminate the unlawful or unfair competition alleged herein.

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AS TO ALL CAUSES OF ACTION

1. That Plaintiff recover the amount of the filing fees and the amount of the fee for the service of process or notices which would have been paid but for Government Code section 6103.5, designating it as such. The fees may, at the Court's discretion, include the amount of the fees for certifying and preparing transcripts.

2. That Plaintiff be granted such other and further relief as the Court deems just and proper.

DATED: June 19, 2017

Respectfully submitted,

Office of the Los Angeles City Attorney

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By:

JANICE S. HAGAN

NANCY C. HAYAN
Attorney for Plaintiff, THE PEOPLE OF THE
STATE OF CALIFORNIA